

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

GLORIA TANKESLY, as personal representative
of JAMES TANKESLY, deceased.

Plaintiffs,

vs.

Case No. [2:18-cv-00996-JCH-KRS](#)
JURY DEMANDED

J.C. PENNEY CORPORATION, INC.

Defendant.

PLAINTIFFS NOTICE OF INTENT TO CALL EXPERT WITNESSES

COMES NOW the Plaintiff, Gloria Tankesly, as personal representative of James Tankesly, by and through her attorney, Samuel I. Kane, P.A., and hereby gives notice that she intends to call expert(s) concerning the injuries sustained and reasonableness of the treatment by Plaintiff, and an expert regarding liability. Plaintiff further reserves the right to call any experts needed to rebut any other expert(s) presented by the parties and to name additional expert witnesses as facts develop during the course of discovery.

1. Michael Cummings
c/o Samuel Kane
Law Office of Sam Kane
Attorney for Plaintiff
1018 E. Amador Ave.
Las Cruces, NM 88001
575-526-5263

Michael Cummings is anticipated to testify about Environmental Health and Safety regarding the incident Plaintiff was involved in; the safety procedures surrounding the incident, and any other topic he is qualified to testify on.

2. Dr. Brian Delahoussaye
c/o Samuel Kane
Law Office of Sam Kane
Attorney for Plaintiff
1018 E. Amador Ave.
Las Cruces, NM 88001
575-526-5263

Dr. Delahoussaye, is anticipated to testify about the medical necessity of procedures performed for the injuries and the reasonableness of their costs.

Respectfully Submitted:

/s/ Samuel I. Kane
Samuel I. Kane
1018 E. Amador
Las Cruces, NM 88001
(575) 526-5263
(575) 647-5264 Fax

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April, 2019, a true and correct copy of the foregoing was emailed to:

J.C. Penney Corporation, Inc.
c/o Nathan Mann and Harriet Hickman
Gallagher, Casados & Mann, PC
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/s/ Samuel I. Kane
Samuel I. Kane